

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SERGIO LOVATI, et al.,

*Plaintiffs,*

*v.*

THE BOLIVARIAN REPUBLIC OF VENEZUELA,

*Defendant.*

No. 19-cv-4793-ALC-VF

No. 19-cv-4796-ALC-VF

**NOTICE OF MOTION FOR SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE** that, pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, and upon the accompanying Declaration of Authorized CMB Monaco Representatives, dated August 10, 2022 and all attached exhibits thereto, Declaration of Rudi Lovati, dated August 11, 2022 and all attached exhibits thereto, Declaration of Alessandro Lucibello Piani, dated August 10, 2022 and all attached exhibits thereto, Declaration of Anthony J. Costantini, dated August 18 2022 and all attached exhibits thereto, Local Civil Rule 56.1 Statement of Material Facts, Memorandum of Law, and all prior pleadings in this action, Plaintiffs Rudi Lovati and Alessandro Lucibello Piani will move this Court, before the Honorable Andrew L. Carter Jr., United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square, New York, New York, 10007, at a date and time to be determined by the Court, for an Order granting summary judgment to Plaintiffs in both above-captioned matters, and granting such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Order of this Court dated July 21, 2022 and entered in both above-captioned matters, any opposition papers shall be filed on or before September 8, 2022, with any reply brief being filed on or before September 22,

2022.

Dated: New York, New York  
August 18, 2022

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